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April 6, 2016

VIA ECF

The Hon. Judge P. Kevin Castel
United States District Judge
Southern District of New York
500 Pearl St.
New York, NY 10007

Re: *Bahr v. PNW Enterprises, LLC d/b/a New York Kids Club, 16 CV 1223*

Dear Judge Castel:

We represent the Plaintiff in the above-referenced action. We write to respectfully request a three-day extension of time for the Parties to file their joint letter, presently due on April 15, 2016, in anticipation of the Initial Conference, presently scheduled for April 22, 2016, at 2:30 a.m.

Yesterday, April 5, 2016, the Parties met and conferred on a variety issues. Having made substantial progress, the Parties agreed to resume discussions on April 19, 2016, which was the earliest they could meet due to both Parties' counsel's schedules. As such, the Parties respectfully request that the Court allow them until April 20, 2016 to submit their joint letter.

This request is Plaintiff's first request for an extension of time to file their joint letter. The Parties requested an adjournment of the Initial Conference, which the Court granted. Defendant's counsel consents to the adjournment. The adjournment does not affect any other scheduled dates.

Thank you for your time and attention to this matter.

Respectfully submitted,



Walker G. Harman, Jr.

cc: Lloyd Jeffrey Weinstein (via ECF)